

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

SHADEESHA BROWN, et al.,	:	
	:	CIVIL ACTION
Plaintiffs,	:	
	:	
v.	:	No. 11 Civ. 1068 (AJN)
	:	
THE CITY OF NEW YORK, et al.,	:	
	:	
Defendants.	:	
	:	

DECLARATION OF MARTIN S. BLOOR

1. I am an attorney of the law firm Pepper Hamilton LLP, and am admitted to practice in the State of New York. I am an attorney of record for Defendants in the above-captioned action.

2. I submit this Declaration on behalf of Defendants in support of the Defendants' Response in Opposition to Plaintiff's Motion in Limine.

3. Attached hereto at Exhibit A is, to my best knowledge, a true and correct copy of a production letter dated March 9, 2012 addressed to Eugene Bellin, Esq., and a document bates numbered NYC 098 produced therewith.

4. Attached hereto at Exhibit B is, to my best knowledge, a true and correct copy of excerpts from the transcript of the April 25, 2012 deposition of Joaquin Morales.

5. Attached hereto at Exhibit C is, to my best knowledge, a true and correct copy of excerpts from the transcript of the March 16, 2012 deposition of Corey Jones.

6. Attached hereto at Exhibit D is, to my best knowledge, a true and correct copy of excerpts from the transcript of the April 30, 2012 deposition of Brian McAlear.

7. I declare under penalty of perjury that the foregoing is true and correct.

Executed on April 22, 2013
In New York, New York

/s/ Martin S. Bloor

Martin S. Bloor